

**REMARKS**

Claims 1-25 are pending in this application. By this Amendment, claims 3, 10 and 12-20 are amended in order to make the claims more easily readable. No new material is added. None of the amendments narrow the scope of the claims, and Applicant does not disclaim any equivalent of any amended limitation. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

The Office Action rejects claims 3, 10 and 12-20 under 35 U.S.C. §112, second paragraph. In response, claims 3, 10 and 12-20 are amended to obviate the rejection. Accordingly, withdrawal of the rejection is respectfully solicited.

The Office Action rejects claim 1-3, 5-6, 8, 10-13, 16-18 and 21-25 under 35 U.S.C. §102(b) over Ladd (U.S. Patent No. 5,864,480); and rejects claims 4, 7, 9, 14-15 and 19-20 under 35 U.S.C. §103(a) over Ladd in view of Liu (U.S. Patent No. 5,794,257). These rejections are respectfully traversed.

**Claims 1-11 and 23-24 are Directed to Patentable Subject Matter**

In particular, Applicant asserts that neither Ladd nor Liu, individually or in combination, teach or suggest an electronic product manual comprising that includes a plurality of data structures holding data representing a product and having a hierarchical relationship as components and sub-components with each other, as recited in independent claim 1 and similarly recited in independent claim 23.

Ladd discloses a computer-implemented system for developing product documentation. See, Abstract. As shown in Fig. 2, the Ladd system is capable of displaying a tree-structure

representing an organization of projects. See also, col. 4, lines 6-15. However, Ladd does not teach or suggest a plurality of data structures holding data representing a product and having a hierarchical relationship as components and sub-components with each other, as recited in independent claims 1 and 23.

To the contrary, the Ladd disclosure is specifically directed to the organization of processes. While the Office Action cites Fig. 2 claiming that it discloses a hierarchy of components and sub-components (see, page 3, section 10), Applicant respectfully points to the text embedded in Fig. 2, as well as the accompanying text of col. 4, lines 16-29, that unequivocally describes the tree-like structure of Fig. 2 in terms of project phases, milestones and decision points, not components and sub-components. That is, **the only hierarchical aspects of Ladd involve project management and have nothing to do with structural formations of any product**. Thus, Ladd does not teach or suggest each and every component of the claimed invention.

Liu discloses a system and method for automatic hyper-linking to produce manuals. See, Abstract. However, Liu does not teach or suggest a plurality of data structures holding data representing a product and having a hierarchical relationship as components and sub-components with each other, as recited in independent claims 1 and 23, *nor does the Office Action assert such*. Thus, Liu does not provide for the deficiencies of Ladd.

Thus, Ladd and Liu, individually or in combination, do not teach anticipate the claimed invention. Further, the Office Action has not provided any *prima facie* case of obviousness. To establish a *prima facie* case of obviousness, (1) the prior art references must teach or suggest all the claim limitations, (2) there must be some motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify or combine the reference

teachings, and (3) there must be a reasonable likelihood of success that the claimed combination will work. See MPEP §2143, for example. *All three requirement must be met.*

As discussed above, Ladd and Liu, individually or in combination, do not teach or suggest all the claim limitations.

Furthermore, there is no motivation, either in the cited references themselves or in the knowledge generally available to one of ordinary skill to modify Ladd using the teachings of Liu. While the Office Action states on page 10 that “it would have been obvious ... to have an external store containing the most up-to-date information of a manual for convenience of a user,” this stated motivation is problematic for a number of reasons.

First, the stated motivation is not found in any reference of record.

Second, the Office Action provides no evidence, other than an unsupported conclusion, that this motivation would ever be apparent to one of ordinary skill in the art.

Third, as Liu is directed to hyperlinking on service manuals while Ladd is directed to organizing management processes, it is not clear that the Ladd system could benefit from any information provided in the Liu disclosure.

Accordingly, there can be no *prima facie* case of obviousness to modify Ladd based on the teachings of Liu. Thus, independent claims 1 and 23 are directed to patentable subject matter. The dependent claims are directed to patentable subject matter by virtue of their dependency as well as for the additional features they recite. Accordingly, Applicant respectfully requests withdrawal of the rejections under 35 U.S.C. §§ 102(b), 103(a).

**Claims 12-22 are Directed to Patentable Subject Matter**

In particular, Applicant asserts that neither Ladd nor Liu, individually or in combination, teach or suggest a display object for a product manual that includes a link to a unit data structure, a first presentation means and a second presentation means initiated in response to selection of the displayed object and operable to retrieve a hierarchical view from the unit data structure and display the hierarchical view using the graphical user interface, as recited in independent claim 12.

Ladd discloses the methods and systems discussed above. Ladd does not teach or suggest a presentation means initiated in response to selection of the displayed object and operable to retrieve a hierarchical view from the unit data structure and display the hierarchical view using the graphical user interface.

To the contrary, as discussed above the Ladd disclosure is specifically directed to the organization of managerial processes, and that, the only hierarchical aspects disclosed in Ladd have nothing to do with structural formations of any product. Thus, Ladd does not teach or suggest each and every component of the claimed invention.

Liu discloses a systems and methods as described above. Liu does not teach or suggest a presentation means initiated in response to selection of the displayed object and operable to retrieve a hierarchical view from the unit data structure and display the hierarchical view using the graphical user interface, *nor does the Office Action assert such*. Thus, Liu does not provide for the deficiencies of Ladd.

Thus, Ladd and Liu, individually or in combination, do not teach anticipate the claimed invention. Further, the Office Action has not provided any *prima facie* case of obviousness, and

as Liu is directed to hyperlinking on service manuals while Ladd is directed to performing processes, it is not clear that the Ladd system could benefit from any teaching of the Liu disclosure.

Therefore, independent claim 12 is directed to patentable subject matter. The dependent claims are directed to patentable subject matter by virtue of their dependency as well as for the additional features they recite. Accordingly, Applicant respectfully requests withdrawal of the rejections under 35 U.S.C. §§ 102(b), 103(a).

**Claim 25 is Directed to Patentable Subject Matter**

In particular, Applicant asserts that Ladd does not teach or suggest an **appliance** having computer code devices executing on the data processor to cause the processor to implement a graphical user interface displaying data obtained from the external data sources, as recited in independent claim 25.

Ladd discloses the methods and systems discussed above. Ladd does not teach or suggest a an **appliance** having computer code devices executing on the data processor to cause the processor to implement a graphical user interface displaying data obtained from the external data sources.

To the contrary, while the Ladd disclosure does disclose a general-purpose computer system capable of displaying a GUI, the methods and systems of the present disclosure specifically envision appliances, e.g., washing machines (see, Fig. 2), that perform specific functions other than generalized computing. Accordingly, it should be appreciated that the term “appliance” specifically excludes general-purpose computing systems, such as PCs, and encompasses a range of devices, such as toasters and washing machines, designed to perform a specific function for household use.

Thus, Ladd does not teach anticipate the claimed invention. Therefore, independent claim 25 is directed to patentable subject matter. Accordingly, Applicant respectfully requests withdrawal of the rejection under 35 U.S.C. § 102(b).

**Conclusion**

Applicant respectfully solicits that this Application is in condition for allowance, and Applicant requests that the Examiner give the Application favorable consideration and permit it to issue as a patent. However, if the Examiner believes that the Application can be put in even better condition for allowance, the Examiner is invited to contact Applicant's representative listed below.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 502036 and please credit any excess fees to such deposit account.

Respectfully submitted,

BAKER & HOSTETLER LLP



B. Y. Mathis  
Registration No. 44,907

Date: November 29, 2004  
Washington Square, Suite 1100  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Phone: (202) 860-1500  
Fax: (202) 861-1783